



March 3, 2014

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expression of Interest Letter – WC Docket 10-90, Connect America Fund

Dear Ms. Dortch,

This letter is submitted to Express Interest in participating in the Rural Broadband Experiments. Sacred Wind Communications, Inc. (“Sacred Wind”) is an incumbent Rate of Return rural local exchange carrier (“RoR RLEC”) providing voice and broadband services to rural, mainly tribal, consumers for over seven years in rural New Mexico with an average density of 1.6 customers per square mile. Sacred Wind has newly installed service to over 1,500 tribal homes since its inception and is one of the few local exchange carriers that is experiencing consistent access line growth each year. This track record proves that Sacred Wind has the experience and dedication to rural consumers needed to successfully deploy broadband in unserved areas. Sacred Wind has also developed a broadband system for the Laguna Pueblo and works well with the Navajo Nation and Laguna tribal government.

Broadband networks, particularly high-speed broadband networks, are expensive to build and cost recovery typically requires multiple years in rural high-cost areas and, therefore, Sacred Wind is very interested in partnering with the FCC to conduct experiments to find creative ways of deploying high-speed, scalable, IP-based networks in rural extremely high-cost areas outside of its certificated service territory. In particular, Sacred Wind

recognizes the need for service to be available to local schools, hospitals and other anchor institutions to ensure rural economic development and opportunity for all Americans. To that end, Sacred Wind will take steps to ensure our experiments maximize accessibility for all anchor institutions in the proposed areas. The details of our potential experiment are found below.

Location of Potential Experiments

Sacred Wind is interested in providing service to eligible locations in Census Tract 9439.01 on Navajo reservation land, Tribal 2430, within McKinley County, New Mexico, occupied by the Chichiltah Chapter of the Navajo Nation. Sacred Wind's current certificated service territory and its telecommunications network is adjacent to this Census Tract and, as such, is prepared to extend broadband service to the Census Tract more affordably than can other offerors. According to the FCC's release of potentially eligible Tracts, there are roughly 700 eligible locations within the Tract covering approximately 204 square miles with an average density of 3.8 locations per square mile. These locations include two large schools, two small schools, a Head Start facility, one senior center, and the Chapter's administrative building, which would benefit from the experiment. This area is currently served by an incumbent that has not been able to expand service or introduce broadband to the occupants. According to the U.S. census, over 40% of the households in this Tract do not have access to even basic voice service.

<i>Census Tract Number</i>	<i>Number of Locations</i>	<i>Number of Anchor Institutions</i>
9439.01	749	7

Broadband Technology

Based on the funding level available, Sacred Wind would extend fiber 14 miles from an end point of its current fiber route that stops at a point at its service territory border and would continue two separate fiber spurs of eight miles in length each to a major school within Chichiltah Chapter and to the Chapter administrative center. At this latter point, Sacred Wind would install a fixed wireless communications tower to

distribute broadband to each residential location by way of subscriber radio units attached to the premise.

Service Offerings

The IP Network described above would be capable of supporting voice, high-speed broadband of at least 4Mbps downstream and 1Mbps upstream up to 15 Mbps downstream and 1 Mbps upstream. Anchor institutions would be able to receive broadband at 10 Mbps to 15 Mbps downstream and 1 Mbps upstream, or higher if required. The exact prices of these services still need to be determined; however, they will likely be similar to Sacred Wind's current offerings to our existing customers:

Monthly rates

2Mbps/1Mbps - \$45.00

4Mbps/1Mbps - \$55.00

6Mbps/1Mbps - \$65.00

10Mbps/1Mbps - \$100.00

15Mbps/1Mbps - \$130.00

Existing Providers

Although CenturyLink (aka CenturyTel of Southwest) serves a portion of the proposed experiment area, the service, over a copper landline network, is limited to voice service and is bound to arduous rights of way restrictions. The incumbent's service is inferior to the network that Sacred Wind would deploy in its experiment and it is therefore in the public interest for the FCC to deviate from its general policy of not supporting two or more providers in an area.

Tribal and Community Participation or Partnerships

Sacred Wind expects Navajo Nation and local community support for the project including expedited permitting for access to rights of way for a short optical fiber extension and for fixed wireless facilities.

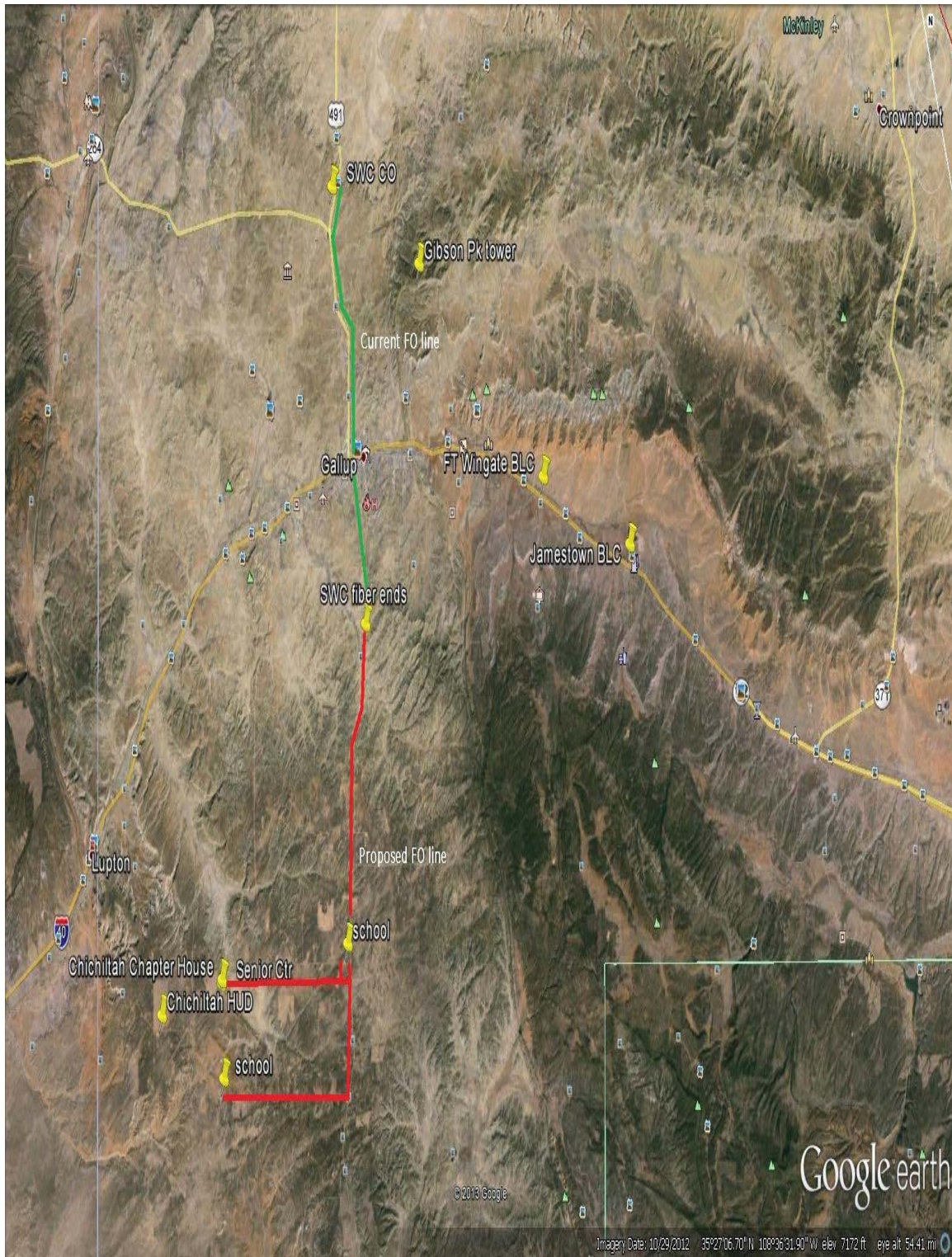
Necessary Funding

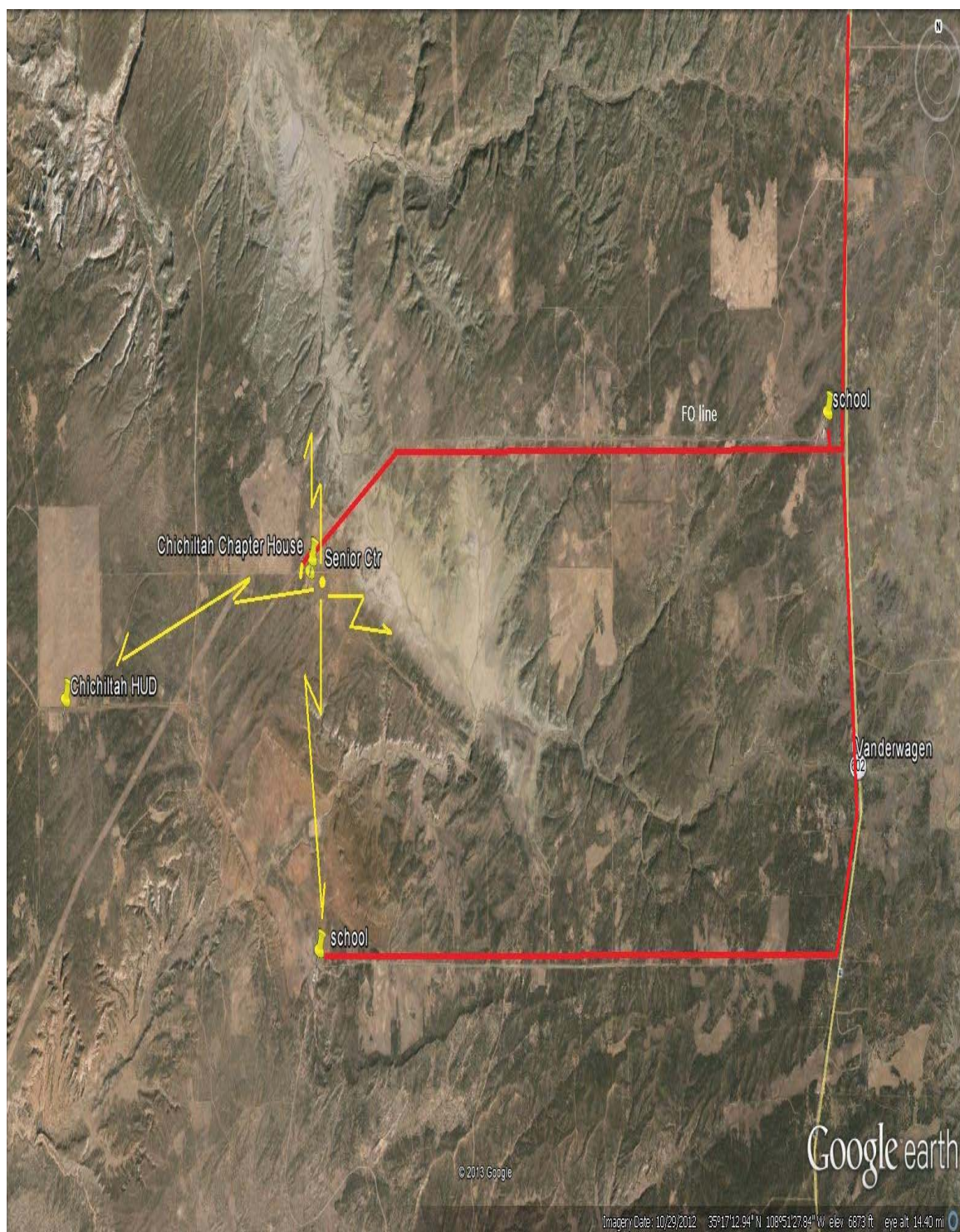
Sacred Wind estimates that this experiment will require \$1,750,000 to construct the required facilities. Accordingly, the Company would require this amount in one time funding or to be paid out over a 5-year period. As part of this experiment, the Company proposes to determine whether, as a RoR RLEC operating in adjacent service territory, it can provide broadband service to this project's locations without any further Universal Service Fund ("USF") support as long as the project's full capital costs, including installation, are covered by the USF. Sacred Wind's service territory is adjacent to the service territories of three other ILECs operating on tribal lands where basic voice and broadband services in some large areas are inadequate or absent altogether. This experiment would afford the Company the ability to determine whether it could plan to serve those unserved areas in the future. Sacred Wind thanks the FCC for the opportunity to participate in this process. Any questions about this letter of interest should be directed to John Badal at the information below.

Sincerely,

A handwritten signature in dark ink, appearing to read "JB", with a long horizontal stroke extending to the right.

John Badal, CEO





© 2013 Google

Google earth

Imagery Date: 10/29/2012 35°17'12.94" N 108°51'27.64" W elev: 6673 ft eye alt: 14.40 mi